

**REMARKS/ARGUMENTS**

The present Amendment is in response to the Office Action dated March 16, 2011 ("the Action"). Claims 1-11, 13, 15-18 and 20 were rejected in the Action. Claims 1 and 20 have been amended, and no new claims have been added or canceled herein. Support for the amended claims can be found in Applicant's originally filed disclosure. Thus, no new matter has been added. Accordingly, claims 1-11, 13, 15-18 and 20 remain pending in the present application. No new matter has been added. Applicants request reconsideration of the pending claims in light of the amendments made and the remarks in the paragraphs that follow. As the Action is final, Applicants have filed a Request for Continued Examination herewith.

In the Action, the Examiner maintained his previous rejections, again setting forth the following:

- Claims 1, 3-7, 10, 11, 13, 18, and 20 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Pat. Appl. Publ. No. 2003/176925 to Paponneau ("Paponneau") in view of U.S. Pat. No. 6,159,211 to Boriani et al. ("Boriani");

- Claim 2 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Paponneau in view of Boriani as applied to claim 1 and further in view of U.S. Pat. No. 6,607,558 to Kuras ("Kuras");

- Claims 8 and 9 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Paponneau in view of Boriani as applied to claim 6 and further in view of U.S. Pat. No. 5,370,697 to Baumgartner ("Baumgartner"); and

- Claims 15-17 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Paponneau in view of Boriani as applied

to claim 1 and further in view of U.S. Pat. No. 5,899,941 to Nishijima et al.

In a previous Amendment filed January 7, 2011, Applicants amended independent claims 1 and 18 to recite that "the first and second apparatus baseplates and the trunk form a unitary, solid structure." However, the Examiner contends that such a structure may have "elements that are *formed as a unit with other parts*." In response, Applicants have amended claims 1 and 18 herein to even more clearly recite the interface of the baseplates and trunk as one "wherein the first and second apparatus baseplates and the trunk form a monolithic structure." Paponneau clearly does not contemplate a single-piece structure comprising a trunk and baseplates, and Boriani does not cure this deficiency. As such, Paponneau does not teach this feature alone or in combination with Boriani. Thus, Applicants respectfully assert that a *prima facie* case of obviousness cannot be made using the cited references in view of the pending claims. Accordingly, Applicants respectfully assert that independent claims 1 and 18 are unobvious in view of the cited references and are in condition for allowance. Claims 2-11, 13, 15-17, and 20 are also unobvious and in condition for allowance due to, *inter alia*, their dependence from their respective unobvious base claims.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue.

If, however, for any reason the Examiner does not believe that such action can be taken at this time, it is respectfully

requested that he telephone Applicants' attorney at (908) 654-5000 in order to overcome any additional objections which he might have.

If there are any additional charges in connection with this requested amendment, the Examiner is authorized to charge Deposit Account No. 12-1095 therefor.

Dated: June 16, 2011

Respectfully submitted,  
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